

# EXHIBIT A

Pages 1 - 81

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Before The Honorable Peter H. Kang, Magistrate Judge

IN RE: SOCIAL MEDIA )  
ADOLESCENT ADDICTION/PERSONAL )  
INJURY )  
PRODUCTS LIABILITY LITIGATION ) **NO. 22-MD-03047 YGR (PHK)**  
\_\_\_\_\_ )

San Francisco, California  
Monday, April 22, 2024

**APPEARANCES:**

For Plaintiffs:

MOTLEY RICE LLC  
401 9th Street NW, Suite 630  
Washington, DC 20004

**BY: PREVIN WARREN**  
**ATTORNEY AT LAW**

LIEFF, CABRASER, HEIMANN & BERNSTEIN LLP  
275 Battery Street, 29th Floor  
San Francisco, California 94111

**BY: LEXI J. HAZAM**  
**ATTORNEY AT LAW**

BEASLEY ALLEN LAW FIRM  
218 Commerce Street  
Montgomery, Alabama 36104

**BY: JOSEPH G. VanZANDT**  
**ATTORNEY AT LAW**

**(APPEARANCES CONTINUED ON FOLLOWING PAGE)**

Reported By: Kelly Shainline, CSR No. 13476, RPR, CRR  
Official Stenographic Reporter

1 certainly shouldn't be in a situation where their names have  
2 been disclosed, say, in our complaint or other documents but  
3 somehow have to be sealed here and figuring out what the future  
4 implications of that are in coming filings.

5 **THE COURT:** Okay.

6 **MS. LADDON:** Your Honor, I'm not --

7 **THE COURT:** Did you stand up because you want to say  
8 something?

9 **MS. LADDON:** Just very briefly, Your Honor.

10 **THE COURT:** Sure.

11 **MS. LADDON:** Very briefly.

12 Good morning -- good afternoon, rather. Tarifa Laddon for  
13 the TikTok defendants.

14 And we, of course, agree with the remarks that Meta's  
15 counsel's made, but I do have to make very clear for the record  
16 that at least for TikTok the harm is not speculative,  
17 Your Honor, at all.

18 We have a list of about 14 names the plaintiffs have  
19 provided to us that they -- of individuals that they want to  
20 depose. These are not all high-ranking executives. These are  
21 a lot of just regular folks who are going about their day and  
22 doing their jobs.

23 And at least at TikTok we have had actual situations where  
24 people receive threats and people's lives, regular everyday  
25 people lives, are upended because the public has found out that

1 they're working for the company and involved in certain  
2 projects, and that is specifically what we're trying to avoid  
3 here.

4 This is essentially a discovery management document that  
5 the Court has ordered us to produce. It's almost akin to a  
6 meet-and-confer document, to be honest with you, about  
7 individuals that they wish to depose for the Court's use and  
8 ensuring that the process of noticing and taking depositions  
9 goes quickly and expeditiously.

10 We do not file on the docket notices of deposition in the  
11 ordinary course of litigation. Those are usually served  
12 between counsel, and so I just wanted to make it clear that at  
13 least for TikTok, Your Honor, this is not a speculative harm.  
14 This is a harm that we take very seriously and we're concerned  
15 for our employees.

16 **MS. HAZAM:** Your Honor, if I may, because that  
17 interjected new information.

18 I certainly do not hear counsel saying that that's as a  
19 result of anything in this case. I don't believe it to be. I  
20 know none of the details. This is new information; but, again,  
21 this is simply a list of employee names, titles, and defendant  
22 who they work for.

23 **THE COURT:** Okay. So point number one, continue to  
24 send the full chart to me by e-mail because I don't -- right?  
25 But I'm also going to order that a redacted version of the